

Proposal for 04 series of amendments to Regulation No. 107

This document supersedes official document ECE/TRANS/WP.29/GRSG/2010/34

A. PROPOSAL

*Insert new paragraphs 10.16. to 10.20., to read:*

- “10.16. As from the official date of entry into force of the 04 series of amendments, no Contracting Party applying this Regulation shall refuse to grant approval under this Regulation as amended by the 04 series of amendments.**
- 10.17. As from 24 months after the date of entry into force of the 04 series of amendments, Contracting Parties applying this Regulation shall grant approvals only if the vehicle type to be approved meets the requirements of this Regulation as amended by of the 04 series of amendments.**
- 10.18. As from 36 months after the entry into force of the 04 series of amendments, Contracting Parties applying this Regulation may refuse to grant national/regional approvals and first national registration (first entry into service) of a vehicle which does not meet the requirements of the 04 series of amendments to this Regulation.**
- 10.19. Contracting Parties applying this Regulation shall not refuse to grant extensions of approval to the 03 series of amendments to this Regulation for vehicles which are not affected by the 04 series of amendments.**
- 10.20. Notwithstanding paragraphs 10.17 and 10.18, approvals of vehicles granted to the 03 series of amendments to the Regulation, which are not affected by the 04 series of amendments, shall remain valid and Contracting Parties applying the Regulation shall continue to accept them.”**

*Annex 8, paragraph 3.2.6., amend to read:*

- “3.2.6. The foot space at priority seating positions shall extend forward of the seat from a vertical plane through the forward edge of the seat cushion. The foot space shall not have a slope in any direction of more than 8 percent. For vehicles of Classes I and A, the vertical distance between the floor of the seating area and the adjacent gangway shall be not more than 250 mm.”**

B. JUSTIFICATION

1. The transition from a sunken gangway to a seating area is not considered to be a step. The vertical distance between the gangway surface and the

floor of a seating area can be up to 350 mm. Such a high step can prevent passengers with reduced mobility from accessing the priority seats. We agree with document ECE/TRANS/WP.29/GRSG/2009/15 that this situation is not appropriate.

2. Our proposal aims to reduce the maximum permitted vertical distance between the foot space of a priority seat and the surface of the adjacent gangway to a reasonable level for passengers of reduced mobility. A step height of 250 mm is allowed in the entrance steps of vehicles of Class I and A. It is logical to allow the same height between the foot space of a priority seat and the surface of the adjacent gangway.

3. Research in Sweden shows that people of reduced mobility use, in principle, two different ways of approaching a bus seat that is placed adjacent to a sunken gangway; a) they climb the step and move sideways with their back towards the seat and then sit down on the seat, or b) they stand in the gangway with their back towards the seat and sit down on the seat, then they turn and lift up their legs on to the floor at the seat. Those people who sit down on the seat from a standing position in the gangway have advantage of the higher seat height when they sit down or rise.

4. Many low floor vehicles of Class I and A in Sweden have the seats mounted on a floor that is about 250 mm above the gangway surface. The bus manufacturers use the space under the floor for components of the braking and suspension systems, fuel tanks and other equipment. To significantly reduce this floor height would mean a costly re-design of several bus models with the risk of safety critical parts being located in vulnerable positions, but without giving any noticeable advantages for passengers with reduced mobility.

5. Appropriate transitional provisions have been introduced to give manufacturers sufficient time to introduce the necessary modifications to buses which have a transition from a sunken gangway to a seating area exceeding 250 mm.

6. The experiences in Sweden show that many persons of reduced mobility, e.g. elderly persons, use low floor buses and they do not have problems with the steps in those buses. In fact during the shopping hours they represent the majority of the passengers. They also use seats other than priority seats having a higher step without any problems.

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